



Municipality of Anchorage

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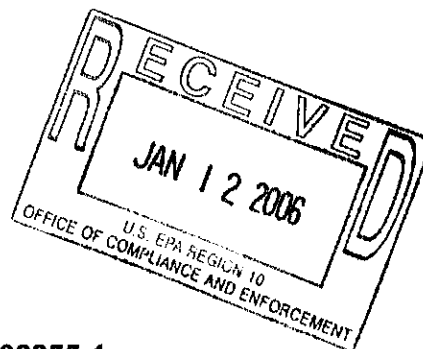


Mayor Mark Begich

Anchorage Water & Wastewater Utility Treatment Division

January 9, 2006

U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit
1200 Sixth Avenue, OW-133
Seattle, Washington 98101



Subject: BOD Percent Removal - NPDES Permit No. AK-002255-1

The John M. Asplund Water Pollution Control Facility has been granted a 301(h) waiver from secondary treatment. Although there isn't a percent removal requirement specifically identified in the NPDES permit, there is a requirement in the NPDES regulations that treatment plants with a 301(h) waiver achieve at least a 30 percent BOD removal calculated on a monthly basis. During December 2005, the facility had a BOD removal of 29 percent.

Influent loadings to the facility have declined in recent years, in part due to a reduction in commercial fish processing activities. This has resulted in a similar decline in the facility's BOD removal capability. Although the decline appears to be leveling off, it is apparent that the Asplund facility's BOD removal figures will occasionally be less than the 30% required by the 301(h) regulations. In contrast, the TSS removal was 77% this month, demonstrating that removal is quite good for the non-dissolved solids that the facility is designed to remove.

The permit renewal application was submitted to EPA in January 2005. The Anchorage Water and Wastewater Utility (AWWU) has requested a change in reporting percent BOD removal from a monthly average basis to a twelve month rolling average. 40 CFR Section 125.6(c)(1) allows an applicant to request a different averaging basis so long as they can demonstrate that:

- The wastewater treatment facility is adequately designed and well operated
- The applicant will meet all requirements under section 301(h) of the CWA and subpart G of 40 CFR Section 125 with the averaging basis selected
- The applicant cannot achieve 30 percent removal on a monthly average basis because of circumstances beyond the applicant's control, including relatively high soluble to insoluble BOD ratios on a fluctuating basis and cold climates resulting in cold influent

AWWU included this demonstration in the application.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Community, Security, Prosperity

I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,



J. Kris Warren
Manager, Treatment Division - AWWU

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality
John F. Knue Jr. (Jack), General Foreman, John M. Asplund WPCF - AWWU